

6. Rachel Aldridge met with Beverly Beaumier in jail on January 16, 2018. During this meeting, Plaintiff agreed that Brooklyn would stay in the custody of the natural father, Ron Lott, until she got out of jail. Plaintiff also agreed to a Safety Plan to that effect. [Deposition of Rachel Aldridge, 37:4-23; Exhibit A, Transcript of Voicemail left by Rachel Aldridge (the transcript is authenticated by Aldridge in an Affidavit, Doc. 1-2 p.5, 31 ¶ 14)].
7. On January 23, 2018, Brooklyn's natural father Ron Lott petitioned the Superior Court of Pierce County to be the legitimated father of Brooklyn and for temporary custody. [Exhibit B, Lott's Petition to Legitimate Minor Children with Custody and Visitation and Child Support; Exhibit C, Rule Nisi Order granting Lott's Petition ordered on January 23, 2018].
8. Defendant Beverly Beaumier had knowledge of the Court's Rule Nisi Order on January 23, 2018 and was aware that Lott had been awarded temporary custody. [Deposition of Beverly Beaumier, 21:7-17, 29:9-19, 43:23-44:7].
9. Plaintiff Rachel Aldridge spoke to Beverly Beaumier on January 16, 2018, when she agreed to Brooklyn remaining with Lott while in jail, and again on January 22, 2018. After January 22nd, Aldridge did not speak to Beaumier again. [Deposition of Rachel Aldridge, 31:9-13].
10. When a Pierce County Superior Court Judge ordered that Lott be given temporary custody of Brooklyn, Brooklyn's placement in Lott's home was no longer under the control of Beverly Beaumier or DFCS. [Deposition of Beverly Beaumier, 21:7-17, 29:9-19].
11. The Pierce County Superior Court Judge ordered Plaintiff Aldridge to appear at a hearing on March 1, 2019, to advise the Court if Lott should be legitimated and granted joint custody. [Exhibit C, Rule Nisi].
12. On March 1, 2018, a court hearing was held at the Pierce County Superior Court to determine whether Lott should be legitimized as Brooklyn's father and if Lott should

be granted joint custody. Both Rachel Aldridge and Ron Lott appeared at the hearing. [Deposition of Rachel Aldridge, 37:24-39:15].

13. At the March 1, 2018 hearing, Plaintiff Rachel Aldridge voluntarily agreed that Lott should be legitimated as Brooklyn's father and that Lott should be given joint custody of Brooklyn. Aldridge testified as follows:

Q: On March 1st you said you went to court?

A: Yes, sir.

Q: Did you tell the Judge that Mr. Lott and Ms. Coleman were on drugs?

A: I told his attorney. We basically just agreed for joint custody because I thought she needed her father in her life and I thought that he would protect her or something. You know what I'm saying? It was because the rest of my kids, their dads are deceased, and I thought that she needed her father in her life. I thought it was the right thing to do. And that we agreed that Amanda would not be with her alone, that she - that Glendora, the grandmother, was to keep my daughter when I had to work or when Ron had to work. She was not supposed to be left alone with Amanda. That was the agreement.

Q: So did you ever go in front of a judge?

A: We did, but we like agreed beforehand, so then we just -- you know what I'm saying? The Judge just signed off on it or -- Andrew Spivey.

Q: Okay.

A: We agreed for joint custody. I'd keep her for a week. He'd keep her for a week. I'd keep her for a week. He'd keep her for a week. I got to pick her up the Thursday after court.

Q: And did you?

A: I did. And I got to spend till Sunday night. I remember dropping her off at like -- it was -- I was an hour late.

Q: Okay. And that was...

A: Sunday at like 6:16.

Q: Okay. When you dropped her off at – back off at the Lott residence, was Ms. Coleman there?

A: Yeah, she was standing at the door waiting on her and asked me why I was late and Brooklynn was crying really, really bad because she did not want to stay there. She kept telling me, “Don’t take me back to Amanda’s. I don’t want to go to Amanda’s.” And there wasn’t nothing I could do about it.

Q: Because there was a custody agreement in place?

A: Right.

[Exhibit G, Excerpt from the Deposition of Rachel Aldridge, 37:24-39:15; Ex. D, Final Order].

This 20th day of December, 2021.

HENEFELD & GREEN, P.C.

/s/ Noah Green

Noah Green

Georgia Bar No. 468138

Attorney for Defendant Beverly Beaumier

3017 Bolling Way NE, Suite 129
Atlanta, Georgia 30305
(404) 841-1275
ngreen@henefeldgreen.com

